

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 3:22-cr-00327
v.	)	
	)	
	)	
[1] CHESTER GALLAGHER	)	
[2] HEATHER IDONI	)	
[3] CALVIN ZASTROW	)	
[4] COLEMAN BOYD	)	
[6] PAUL VAUGHN	)	
[7] DENNIS GREEN	)	

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM SUPPORTING  
GOVERNMENT’S MOTION TO PRECLUDE IMPROPER ARGUMENTS AND  
IRRELEVANT EVIDENCE**

COMES NOW, the United States of America, by and through undersigned counsel (hereinafter, the “Government”), moves the Court to grant leave to file the Reply Memorandum which accompanies this motion, in support of its motion to preclude improper arguments and irrelevant evidence. As the Reply Memorandum sets out, Defendants’ response to the Government’s motion includes a number of improper requests, as well as characterizations of the Government’s positions and statements of applicable law that require clarification.

WHEREFORE, the Government respectfully requests the Court to grant leave to file the Reply Memorandum that is attached, and to which the Court was alerted in the recent status conference on December 19, 2023.

Respectfully submitted,

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### **CERTIFICATE OF THE SERVICE**

I certify that a true and correct copy of the foregoing was filed electronically and served electronically, via the CM/ECF electronically filing system on this 26th day of December, 2023, upon the following:

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